

FILED

FEB 20 2018

CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CORINISHA D. BARNES,

Defendant.

Criminal No. ~~17-30105-NJR~~

18-CR-30020-NJR

Title 18, United States Code

Section 641 (Misdemeanor)

STIPULATION OF FACTS

The attorney for the United States and the attorney for the Defendant have engaged in discussions and have stipulated to the following facts to support the plea of guilty in accordance with U.S.S.G. § 6B1.4.

1. The Defendant's actions as charged in the Superseding Information occurred in Madison County within the Southern District of Illinois.

2. CORINISHA D. BARNES defrauded the State of Illinois Medicaid Home Services Program by falsely claiming and taking payments for personal assistant services not actually performed. The State of Illinois pays a personal assistant hourly wages for performance of services for a qualified beneficiary. The qualified beneficiary must have a written Employment Agreement with the personal assistant and/or an Individual Provider Payment Policies form. The qualified beneficiary must have a Service Plan listing all services to be provided. In order for the personal assistant to receive payment from the State of Illinois, the beneficiary must submit a Home Services Program Time Sheet form listing the hours worked by the personal assistant and signed by both the beneficiary and personal assistant.

3. The Home Services Program is a Medicaid Waiver Program designed to provide a disabled individual who, with assistance in performing daily living activities in the home, would not require similar care in a nursing home. The Illinois Department of Human Services, Division of Rehabilitation Services (DORS) administers the program. Medicaid Waiver programs enable states to use both state and federal Medicaid funds to pay for services related to medical care that would not ordinarily be covered under Medicaid.

4. On June 11, 2011, BARNES signed an Individual Provider Standards Payment Policies form, along with a qualified Medicaid beneficiary identified as "L.W."

5. Among other things, the Individual Provider Payment Policies form states the following:

- *Individual Providers can only be paid for the hours they worked for the customer per the HSP Service Plan. Billing for hours not worked constitutes Medicaid fraud.*
- *Individual Providers can only be paid for hours and tasks performed in the customer's home unless the task must be completed outside the home such as laundry due to no facilities in the home, banking, and grocery shopping.*
- *Individual Providers cannot work if the customer is out of the home, i.e. in a nursing facility, hospitalized, on vacation, etc. However, there are some exceptions that are allowable, such as the counselor gives prior approval and the request meets the policy guidelines. Please contact the counselor to address any questions before risking non-payment of services provided.*

6. BARNES signed each time sheet under the following printed information:

I certify that the above information is true and in accordance with the Individual Provider Payment Policies (IL488-2252). I understand falsification of any information submitted on this form could lead to criminal prosecution.

7. From on or about June 16, 2015 through on or about June 30, 2015, in furtherance of a scheme to defraud the Medicaid Home Services Program for the State of Illinois, BARNES submitted Home Service Program Time Sheets in which she falsely claimed hours of personal assistant services that were not performed on the dates and times as reported on the Home Services Time Sheets because L.W. was in a hospital and long term care facility at those times.

8. By these means, on or about June 30, 2015, in Madison County, within the Southern District of Illinois, CORINISHA D. BARNES, defendant, admits that she did knowingly steal \$954.33 from the United States (an amount less than \$1000) by reporting on a Home Services Program Time Sheet sent to the Illinois Department of Human Services, Division of Rehabilitation Services, and receiving payment, all in violation of Title 18, United States Code, Section 641.

9. **Restitution.** BARNES agrees to pay restitution in the case. The parties have determined the restitution to consist of the following:

Authorization Number	Dates	Hours	Wage	Amount
936	6/16/12 - 6/30/12	6.5	\$11.55	\$75.08
893	5/16/14 - 5/31/14	4.0	\$11.85	\$47.40
884	10/1/14 - 10/15/14	11.0	\$12.25	\$134.75
883	11/1/14 - 11/15	5.5	\$12.25	\$67.38
870	5/16/15 - 5/31/15	44.0	\$13.00	\$572.00
869	6/1/15 - 6/15/15	84.54	\$13.00	\$1,099.02
868	6/16/15 - 6/30/15	73.41	\$13.00	\$954.33
867	7 /1/15 - 7 /15/15	84.38	\$13.00	\$1,096.94
			Total	\$4,046.89

IT IS SO STIPULATED.



CORINISHA D. BARNES
Defendant



MICHAEL J. QUINLEY
Assistant United States Attorney



DANIEL G. CRONIN
Attorney for Defendant

Dated: 2-20-18, 2018

Dated: 2-20, 2018